

1 [Attorney list on signature page]

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6 UNITED STATES DISTRICT COURT  
7 NORTHERN DISTRICT OF CALIFORNIA  
8 SAN JOSE DIVISION

**\*E-FILED - 10/17/07\***

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10 HYNIX SEMICONDUCTOR INC.; HYNIX  
11 SEMICONDUCTOR AMERICA, INC.;  
12 HYNIX SEMICONDUCTOR U.K. LTD.; and  
13 HYNIX SEMICONDUCTOR  
14 DEUTSCHLAND GmbH,  
15

CASE NO. C 00-20905 RMW

**[PROPOSED] ORDER EXTENDING  
TIME FOR CERTAIN EXPERT  
DISCOVERY**

Plaintiffs,

16 vs.  
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18 RAMBUS INC.,  
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Defendant.

20 RAMBUS INC.,  
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Plaintiff,

22 vs.  
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24 HYNIX SEMICONDUCTOR INC., HYNIX  
25 SEMICONDUCTOR AMERICA INC.,  
26 HYNIX SEMICONDUCTOR  
27 MANUFACTURING AMERICA INC.,  
28  
29 SAMSUNG ELECTRONICS CO., LTD.,  
30 SAMSUNG ELECTRONICS AMERICA,  
31 INC., SAMSUNG SEMICONDUCTOR,  
32 INC., SAMSUNG AUSTIN  
33 SEMICONDUCTOR, L.P.,  
34  
35 NANYA TECHNOLOGY CORPORATION,  
36 NANCY TECHNOLOGY CORPORATION  
37 U.S.A.,  
38  
39 Defendants.

CASE NO. C 05-00334 RMW

1 RAMBUS INC.,

CASE NO. C 05-02298 RMW

2 Plaintiff,

3 vs.

4 SAMSUNG ELECTRONICS CO., LTD.,  
5 SAMSUNG ELECTRONICS AMERICA,  
6 INC., SAMSUNG SEMICONDUCTOR,  
7 INC., SAMSUNG AUSTIN  
SEMICONDUCTOR, L.P.,

8 Defendants.

9 RAMBUS INC.,

CASE NO. C 06-00244 RMW

10 Plaintiff,

11 vs.

12 MICRON TECHNOLOGY, INC., and  
13 MICRON SEMICONDUCTOR PRODUCTS,  
14 INC.,

15 Defendants.

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## STIPULATION AND [PROPOSED] ORDER

WHEREAS, the expert discovery cutoff in the above-captioned actions was set for October 8, 2007 by Order dated July 16, 2007;

WHEREAS, the deadline for Daubert motions in the above-captioned actions was set for October 17, 2007 by Order dated July 16, 2007;

WHEREAS, the parties have agreed to hold the deposition of Jeffrey Lefstin on October 12, 2007;

9 WHEREAS, the parties have agreed to hold the deposition of Bronwyn Hall on  
10 October 15, 2007;

11 WHEREAS, the parties have agreed to hold the deposition of Jon Stark on October  
12 16, 2007;

13 WHEREAS, the parties have agreed to hold the deposition of Peter Heuser on  
14 October 23, 2007;

15 WHEREAS, the parties have agreed to hold the deposition of Bruce Jacob on  
16 October 26, 2007;

17 WHEREAS, the parties have agreed to hold the deposition of David Teece on  
18 November 9, 2007;

**THEREFORE, IT IS ORDERED THAT**

20 The expert discovery cutoff in the above-captioned actions shall be lifted to  
21 accommodate the agreement of counsel on these matters. It is further ordered that the October 17,  
22 2007 deadline for Daubert motions and subsequent briefing schedule is extended for purposes of  
23 any challenge to David Teece, Bruce Jacob, Jon Stark, Bronwyn Hall, Peter Heuser and Jeffrey  
24 Lefstin to the following:

1                   David Teece

2                   Opening brief is due November 28, 2007. Opposition brief is due December 12,  
3 2007. Reply brief is due December 19, 2007. This motion will be heard by the Court on January  
4 11, 2008.

5                   Bruce Jacob

6                   Opening brief is due November 9, 2007. Opposition brief is due November 28,  
7 2007. Reply brief is due December 5, 2007. This motion will be heard by the Court on December  
8 14, 2007.

9                   Jon Stark

10                  Opening brief is due October 30, 2007. Opposition brief is due November 13,  
11 2007. Reply brief is due November 20, 2007. This motion will be heard by the Court on  
12 December 14, 2007.

13                  Peter Heuser

14                  Opening brief is due November 6, 2007. Opposition brief is due November 20,  
15 2007. Reply brief is due November 28, 2007. This motion will be heard by the Court on  
16 December 14, 2008.

17                  Bronwyn Hall

18                  Opening brief is due October 29, 2007. Opposition brief is due November 13,  
19 2007. Reply brief is due November 20, 2007. This motion will be heard by the Court on  
20 December 14, 2008.

21                  Jeffrey Lefstin

22                  Opening brief is due October 26, 2007. Opposition brief is due November 9, 2007.  
23 Reply brief is due November 16, 2007. This motion will be heard by the Court on December 14,  
24 2007  
2008.

25                  SO ORDERED,

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27                  DATED:            10/17/07

*Ronald M. Whyte*

28                  HON. RONALD M. WHYTE

1  
2 ON BEHALF OF MANUFACTURERS:  
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4 DATED: October 12, 2007

Respectfully submitted,

5 By /s/

6 Harold A. Barza  
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20 MICRON SEMICONDUCTOR PRODUCTS,  
21 INC.

22 By /s/

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1 SEMICONDUCTOR DEUTSCHLAND, GmbH  
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18 SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

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31 NANYA TECHNOLOGY CORPORATION  
32 U.S.A.  
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1 ON BEHALF OF RAMBUS:

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6 DATED: October 12, 2007

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By /s/

Gregory P. Stone

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McKOOL SMITH PC

14 Attorneys for

15 RAMBUS INC.

**FILER'S ATTESTATION**

2 I, Erin C. Dougherty, am the person under whose ECF number this **[PROPOSED] ORDER**  
3 **EXTENDING TIME FOR CERTAIN EXPERT DISCOVERY** is being filed, and I attest that I  
4 am authorized to sign and to file by the above-listed counsel for Hynix, Nanya, Micron and  
5 Samsung.

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8 | Dated: October 12, 2007

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Erin C. Dougherty